

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

VANTHA DOUN,

Plaintiff,

vs.

VALMET INC., a foreign profit
corporation,

Defendant.

NO. 2:23-cv-01071 RSM

**STIPULATION AND ORDER TO
EXTEND DISCOVERY
DEADLINES**

The parties through their counsel of record hereby stipulate as follows. They believe good cause exists to extend the discovery deadlines for the following reasons:

1. The parties are scheduled to mediate this case on May 30, 2024 with the Hon. Ronald Cox (Ret.).
2. In the hopes of achieving settlement and in good faith, the parties agree that further depositions should be postponed until after mediation in the event that settlement is reached.
3. However, Plaintiff's counsel is unavailable due from June 4 through June 14, 2024. *See* Dat. No. 14.

- 1 4. In order to provide sufficient time to complete relevant depositions if settlement
2 does not occur on May 30, the parties agree that the discovery cutoff for the
3 purpose of completing these depositions should be extended to **June 28, 2024**.
4 5. Given this extension, the parties further agree that the rebuttal expert disclosure
5 deadline should be extended to **June 10, 2024**.
6 6. All other deadlines, including deadlines for dispositive motions and all trial
7 deadlines, will remain the same.
8

9 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

10 DATED: May 13, 2024

DATED: May 13, 2024

11 FISHER & PHILLIPS LLP

BRESKIN, JOHNSON & TOWNSEND,
PLLC

12 /s/ Catharine M. Morisset

s/ Brendan Donckers (with email permission)

13 Catharine M. Morisset, WSBA #29682

Daniel F. Johnson, WSBA #27848

14 Dean L. Petitta, WSBA #58295

Brendan W. Donckers, WSBA #39406

15 1700 7th Ave., Suite 2200

1000 Second Ave., Suite 3760

Seattle, WA 98101

Seattle, WA 98104

Phone: (206) 682-2308

Phone: (206) 652-8660

16 cmorisset@fisherphillips.com

djohnson@bjtlegal.com

17 dpetitta@fisherphillips.com

bdonckers@bjtlegal.com

ORDER

Based on the foregoing Stipulation, the following deadlines are SO ORDERED:

Deadline	Date
Rebuttal Expert Disclosures	June 10, 2024
Discovery Cutoff	June 24, 2024

DATED this 17th day of May, 2024.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE


The undersigned hereby certifies that on the date written below, I caused a true and correct copy of the foregoing document to be served on the following attorney, via the method indicated:

Daniel F. Johnson, WSBA #27848
Brendan W. Donckers, WSBA #39406
BRESKIN JOHNSON & TOWNSEND, PLLC
1000 Second Avenue, Suite 3670
Seattle, WA 98104
Phone: (206) 652-8660
Email: djohnson@bjtlegal.com
Email: bdonckers@bjtlegal.com
aiarossi@bjtlegal.com
admin@bjtlegal.com
Attorneys for Plaintiff

Via CM/ECF

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 13, 2024 in accordance with 28 USC 1746.


Jazmine Matautia, Legal Secretary